

1 George Haines, Esq.  
2 Nevada Bar No. 9411  
3 Gerardo Avalos, Esq.  
4 Nevada Bar No. 15171  
5 **FREEDOM LAW FIRM, LLC**  
6 8985 South Eastern Ave., Suite 100  
7 Las Vegas, NV 89123  
8 Phone: (702) 880-5554  
9 FAX: (702) 385-5518  
10 Email: info@freedomlegalteam.com  
11 *Attorneys for Plaintiff Kay Aguero*

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Kay Aguero,

Plaintiff,

v.

Experian Information Solutions, Inc;  
Equifax Information Services, LLC;  
Synchrony Financial; First Savings  
Bank; Kohl's Inc.; Avant, LLC; Capital  
One Bank; National Association; The  
Bank Of Missouri; Discover Bank;  
First Bank & Trust; and Comenity  
Capital Bank,

Defendants.

Case No.: 2:23-cv-01155-APG-DJA

**Unopposed Motion for Extension of  
Time for the Bank of Missouri, N.A.  
to Answer or Otherwise Plead**

**First Request**

1 Plaintiff Kay Agüero, hereby files this Unopposed Motion for Extension  
2 of Time for the Bank of Missouri, N.A. to Answer or Otherwise Plead, and in  
3 support states:

4 The Bank of Missouri, N.A.'s ("The Bank of Missouri") responsive  
5 pleading was due on August 28, 2023.

6 Plaintiff and The Bank of Missouri are actively engaged in case  
7 resolution negotiations.

8 Plaintiff does not oppose an extension of The Bank of Missouri's time to  
9 answer the Complaint so that the parties may devote energies to resolving this  
10 matter.

11 Plaintiff files this Motion consistent with its agreement with The Bank  
12 of Missouri and further files this motion respectfully requesting the Court for  
13 an extension of time for The Bank of Missouri to file its responsive pleading  
14 for 14 days to **Thursday, September 14, 2023**.

15 Good cause exists for this extension because it will allow The Bank of  
16 Missouri and its counsel to complete their investigation of the Plaintiff's claim  
17 and possible defenses and prepare responsive pleading. It is expected that  
18 counsel for Plaintiff and The Bank of Missouri will continue to discuss whether  
19 this matter may be resolved without further intervention from the Court in the  
20 interim.

21 This is the first request for an extension of this deadline and the request  
22 is made after the deadline has expired due to excusable neglect. The parties  
23 previously agreed to an informal extension when they began negotiations for  
24 early resolution but the parties failed to submit a request to the Court.

25 ///

26 ///

27 ///

///

1 For the forgoing reasons, Plaintiff requests that the Court issue an order  
2 extending the date to **September 14, 2023** on which The Bank of Missouri must  
3 answer Plaintiff's complaint or otherwise plead.

4 Dated: September 5, 2023.

5  
6 **FREEDOM LAW FIRM, LLC**

7 /s/ Gerardo Avalos  
8 George Haines, Esq.  
9 Gerardo Avalos, Esq.  
10 8985 South Eastern Ave., Suite 100  
11 Las Vegas, NV 89123  
12 *Attorneys for Plaintiff*

13  
14 IT IS SO ORDERED:

15   
16 \_\_\_\_\_  
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: 9/7/2023  
19  
20  
21  
22  
23  
24  
25  
26  
27